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15 Attorneys for Plaintiff
16 JOSEPH BRELSFORD

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19

20 JOSEPH BRELSFORD, on behalf of
himself and all others similarly situated,

21 Plaintiff,

22 v.

23 YOURMECHANIC, INC., a California
24 corporation, d/b/a/ YOURMECHANIC,
and DOES 1-10,

25 Defendants.
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Case No. 3:20-cv-04452-EMC

**STIPULATION TO DISMISS
COMPLAINT WITH PREJUDICE AS TO
PLAINTIFF, AND WITHOUT PREJUDICE
AS TO ANY OTHER ALLEGEDLY
AGGREIVED WORKERS, PURSUANT TO
RULE 41(a)(1)(A)(ii); [~~PROPOSED~~
ORDER]**

Judge: Hon. Edward M. Chen
Complaint Filed: July 5, 2020

1 Plaintiff JOSEPH BRELSFORD, (“Plaintiff”) and Defendant YOURMECHANIC, INC.,
2 (“Defendant”) (collectively, the “Parties”), by and through their respective counsel of record,
3 stipulate and agree as follows:

4 WHEREAS, on July 5, 2020, Plaintiff filed a Class Action Complaint (“Complaint”) in this
5 Court alleging violations of the Fair Labor Standards Act; the California Labor Code and the
6 California Industrial Welfare Commission Wage Orders; the Business and Professions Code; and the
7 California Private Attorneys General Act (“PAGA”) (Dkt. 1);

8 WHEREAS on July 29, 2020, the Parties filed Joint Stipulation to Strike Class and Collective
9 Claims and Stay Case Pending Arbitration of Individual Claims; (Dkt. 10);

10 WHEREAS on July 30, 2020, the Court granted the Parties’ Joint Stipulation to Strike Class
11 and Collective Claims and Stay Case Pending Arbitration of Individual Claims (Dkt. 17);

12 WHEREAS, on February 16, 2022, the Parties executed a confidential settlement agreement
13 to settle Plaintiff’s claims on an individual basis, each party to bear his/its own costs and attorneys’
14 fees incurred.

15 NOW THEREFORE, the Parties respectfully request that the Court ORDER as follows:

16 1. The Complaint, and all claims for relief contained therein, shall be dismissed in its
17 entirety, with prejudice as to Plaintiff, and without prejudice as to any other allegedly aggrieved
18 workers, in accordance with the terms of a confidential settlement agreement, pursuant to FRCP
19 41(a)(1)(A)(ii).

20
21 Dated: March 22, 2022

/s/ Sophia Collins
ANDREW SPURCHISE
SOPHIA B. COLLINS
LITTLER MENDELSON, P.C.
Attorneys for Defendant
YOURMECHANIC, INC.

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25 Dated: March 22, 2022

/s/ Anthony Nunes
ANTHONY NUNES
NUNES WORKER RIGHTS LAW, APC
Attorneys for Plaintiff
JOSEPH BRELSFORD

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~~[PROPOSED]~~ ORDER

Having reviewed the foregoing stipulation, and for good cause appearing, the Court hereby grants the Parties' Joint Stipulation To Dismiss Complaint With Prejudice As To Plaintiff, And Without Prejudice As To Any Other Allegedly Aggrieved Workers, and dismisses Case No. 3:20-cv-04452-EMC with prejudice as to Plaintiff, and without prejudice as to any other allegedly aggrieved workers. Each party shall bear its own costs and fees.

IT IS SO ORDERED.

DATED: March 22, 2022



HON. EDWARD M. CHEN

United States District Judge